

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FAN ZHANG, Individually and on Behalf of)	No. 1:12-cv-02450
All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	Judge Charles R. Norgle, Sr.
)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,)	
)	
Defendants.)	
)	
<hr/> KATHLEEN ROSELLI, Individually and on)	No. 1:12-cv-02460
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	Judge Charles R. Norgle, Sr.
)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,)	
)	
Defendants.)	
)	
<hr/>)	

[Caption continued on following page.]

THE CONSTRUCTION LABORERS PENSION TRUST OF GREATER ST. LOUIS'S
MOTION FOR CONSOLIDATION, APPOINTMENT AS LEAD PLAINTIFF AND
APPROVAL OF LEAD PLAINTIFF'S SELECTION OF LEAD COUNSEL

DENNIS EINSPAHR, Individually and on)	No. 1:12-cv-02547
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	Judge Charles R. Norgle, Sr.
)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,)	
)	
Defendants.)	
)	
<hr/> JOHN PEDROW, Individually and on Behalf)	No. 1:12-cv-02791
of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	Judge Charles R. Norgle, Sr.
)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,)	
)	
Defendants.)	
)	
<hr/> JOHN H. COTTRELL, Individually and on)	No. 1:12-cv-03129
Behalf of All Others Similarly Situated,)	
)	<u>CLASS ACTION</u>
Plaintiff,)	
vs.)	Judge Charles R. Norgle, Sr.
)	Magistrate Judge Nan R. Nolan
GROUPON, INC., et al.,)	
)	
Defendants.)	
)	
<hr/>)	

The Construction Laborers Pension Trust of Greater St. Louis (the “Pension Trust”) moves this Court for an Order (attached hereto as Exhibit A): (1) consolidating the five related actions pursuant to Rule 42(a) of the Federal Rules of Civil Procedure; (2) appointing the Pension Trust as lead plaintiff in this action pursuant to the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §78u-4; and (3) approving the Pension Trust’s selection of Robbins Geller Rudman & Dowd LLP as lead counsel for the class.

In support of this Motion, the Pension Trust submits a memorandum of law and true and correct copies of the following exhibits:

Exhibit A: [Proposed] Order;

Exhibit B: Notice of pendency of class action published on *Business Wire*, a national business-oriented wire service, on April 3, 2012;

Exhibit C: The Pension Trust’s Sworn Certification; and

Exhibit D: Firm résumé of Robbins Geller Rudman & Dowd LLP.

DATED: June 4, 2012

ROBBINS GELLER RUDMAN
& DOWD LLP
JAMES E. BARZ (IL Bar # 6255605)

s/ JAMES E. BARZ
JAMES E. BARZ

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[Proposed] Lead Counsel for Plaintiffs

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217/544-9894 (fax)

Additional Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2012, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 4, 2012.

s/ JAMES E. BARZ

JAMES E. BARZ

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& DOWD LLP

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Mailing Information for a Case 1:12-cv-02450

Electronic Mail Notice List

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Manual Notice List

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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